

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

BRIAN BONNER,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO. 3:06-cv-00715-MHT
)	
INTERSTATE ARMS CORP., et al.,)	
)	
Defendants.)	

WITNESS AND EXHIBITS LIST

COMES NOW the Plaintiff, Brian Bonner, and pursuant to this Honorable Court's Pretrial Order, submits his Witness and Exhibit List as follows:

WITNESS LIST

Plaintiff provides the following list of individuals he may utilize, either live or by deposition, at the trial of this matter:

1. Brian Bonner, Plaintiff
2. Owena Knowles
3013 Hopewell Road
Valley, AL 36854
334-756-5878
3. Jim Knowles
3013 Hopewell Road
Valley, AL 36854
706-518-7597
4. Bobbie Dennis
503 Wellington Street
Valley, Alabama 36854
Phone Number Unknown

5. Ralph Stewart
Address Unknown
Phone Number Unknown
6. B. J. Sadler
Address Unknown
Phone Number Unknown
7. Ms. Hu Jie
Qiqihar Hawk Industries Employee
8. Corporate representative of Qiqihar Hawk Industries
9. Corporate representative of Norinco a/k/a China North Industries Corporation
10. Corporate representative of Interstate Arms Corporation
11. John T. Butters, P.E.
Engineering Consultants, Inc.
158 Cook Lane
Center Point, TX 78010
12. Joseph M. Miller
207 Avenue "A" Southeast
Lafayette, AL 36862
13. William E. Hardy, Jr., Ph.D., J.D.
558 Merimont Blvd.
Auburn, AL 36830
14. Raymond Thompson
1500 1st Avenue North, Suite B117
Birmingham, AL 35203
15. Dr. Burton Sundin, M.D.
Kirklin Clinic
2000 6th Ave S
Birmingham, AL 35233
800) 822-8816
16. Dr. James N. Long
Kirklin Clinic
1802 6th Avenue South
Birmingham, AL 35249

(205) 934-9999

17. Dr. Martin, Lanier Memorial Hospital
18. Any and all rebuttal witnesses.
19. Any person who was a witness to the incident or any consequence of the incident made the basis of this lawsuit.
20. Any person who has been deposed or who has yet to be deposed.
21. Any person who has signed interrogatory answers on behalf of any defendant.
22. Any witness whose name is listed as a witness for any defendant.
23. Any witness who may be necessary to authenticate any document or item introduced as an exhibit, who cannot be anticipated at this time.
24. Any and all individuals who may have performed an investigation regarding the subject accident.
25. Any and all witnesses necessary to explain and/or clarify the testimony of any other witness.
26. Plaintiff reserves the right to assert additional witnesses at a later date.

EXHIBIT LIST

Plaintiff provides the following list of exhibits he intends to use at the trial of this matter. Plaintiff will provide any such documents for copying and inspection at the request of the Defendants.

1. Any and all correspondence between the parties.
2. Any and all medical and billing records obtained from the University of Alabama Health Services Foundation.
3. Any and all medical and billing records obtained from UAB Hospital.
4. Any and all medical and billing records obtained from George Lanier Hospital.

5. Any and all medical and billing records obtained from the Orthopaedic Clinic.
6. Any and all medical and billing records obtained from East Alabama Medical Center.
7. Any and all medical and billing records obtained from Human Performance and Rehabilitation Centers.
8. Any and all medical and billing records obtained from Dr. James N. Long at the Kirklin Clinic.
9. Joint Stipulations regarding medical records executed by counsel for all parties.
10. Any and all photographs taken by the plaintiff.
11. Any and all photographs taken by any defendant.
12. Any and all photographs taken by any expert witness.
13. Any and all documents relied upon by expert John T. Butters, P.E.
14. Any and all documents relied upon by expert Joseph M. Miller.
15. Any and all documents relied upon by expert William E. Hardy, Jr., Ph.D., J.D.
16. Any and all documents and materials received in response to a subpoena(s) issued in this matter.
17. Any and all exhibits necessary for rebuttal and/or impeachment.
18. All Interrogatories propounded by any party, as well as the answers submitted thereto.
19. All documents produced during discovery by any and all parties.
20. All exhibits listed by the defendants.
21. Any and all deposition transcripts of witnesses in this case and exhibits attached thereto.
22. The twelve gauge shotgun at issue in this case.

23. Plaintiff reserves the right to add additional exhibits at a later date.

Respectfully submitted,

s/ David J. Hodge

Bar Number: ASB -4617-171H

Of Counsel for Plaintiff

Pittman, Dutton, Kirby & Hellums, P.C.

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THE WOOTEN LAW FIRM
P.O. Drawer 290
Lafayette, Alabama 36862

CERTIFICATE OF SERVICE

I hereby certify that on **11th** day of **August**, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Todd M. Higey, Esq.
RICHARDSON CLEMENT, P.C.
200 Cahaba Park Circle, Suite 125
Birmingham, AL 35242
Attorney for Interstate Arms and Qiqihar Hawk

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Alan D. Mathis, Esq.
JOHNSTON, BARTON, PROCTOR & POWELL, LLP
2900 Regions/Harbert Plaza
1901 6th Avenue North
Birmingham, AL 35203
Attorneys for Norinco

/s/David J. Hodge

Of Counsel for Plaintiff